EXHIBIT A

Total Action 1 1/1/20 1710	1	Control Number	Production Begin	Date	Author	From	То	cc	BCC Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachmer Attachme
Production Pro			Ç				(Law)" <eproshan@law.ny< td=""><td>(vl.tpigroup@rocketmail.com)"</td><td></td><td></td><td></td><td></td><td>Communication (email chain) regarding this litigation (related to drafting legal documents) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in</td><td>0</td></eproshan@law.ny<>	(vl.tpigroup@rocketmail.com)"					Communication (email chain) regarding this litigation (related to drafting legal documents) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in	0
Front Broaders Prophenics Exception Prophenics Exception Prophenics Exception Exception	3	DMNL00241_000006131		12/17/20 10:32		<pre><frank.brostrom@gmail.< pre=""></frank.brostrom@gmail.<></pre>	(Law)" <eproshan@law.ny< td=""><td></td><td>Re: Cumberland County SO</td><td></td><td>Microsoft Outlook Note</td><td>AWP</td><td>litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this</td><td>0</td></eproshan@law.ny<>		Re: Cumberland County SO		Microsoft Outlook Note	AWP	litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this	0
Transit Transit And State Section Section	4	DMNL00241_000006133		12/18/20 12:36		<pre><frank.brostrom@gmail.< pre=""></frank.brostrom@gmail.<></pre>	(Law)" <eproshan@law.ny< td=""><td></td><td>Re: Atlantic Dominion</td><td></td><td>Microsoft Outlook Note</td><td>AWP</td><td>litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this</td><td>0</td></eproshan@law.ny<>		Re: Atlantic Dominion		Microsoft Outlook Note	AWP	litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this	0
Integration pleased to factual investigation of Adatatic Demonsion, FreeCol Devices Adaptive Adatatic Demonsion, FreeCol Devices Adaptive	5	DMNL00241_000006146	NYC_0008678	12/19/20 23:25						mary001.d		AWP	investigation of Atlantic Dominion, FreeCo) drafted in December 2020 for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other	0
Communication femal chain) regarding this litigation (related to factual investigation of countered and vincent transport of countered vincent and vincent transport of countered vincent and vincent transport of countered vincent and vincent transport of counter	6	DMNL00241_000006147		12/22/20 0:56		<pre><frank.brostrom@gmail.< pre=""></frank.brostrom@gmail.<></pre>	(Law)" <eproshan@law.ny< td=""><td></td><td>Re: Justic Freeman Summar</td><td>y</td><td>Microsoft Outlook Note</td><td>Enforcement Privilege;Com mon Interest</td><td>litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiffs counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiffs counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by</td><td>0</td></eproshan@law.ny<>		Re: Justic Freeman Summar	y	Microsoft Outlook Note	Enforcement Privilege;Com mon Interest	litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiffs counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiffs counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by	0
Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's coursel and Frank Brostrom, an investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiff's counsel's communications with the shade of the privilege. Communications were Privilege. Common interest in the prosecution of cigarette trafficking shared by Goods and Blaw. ny C. gov Proshanely, Eric (Law)" Proshansky, Eric (Law)" Proshansky, Eric (Law)" Proshansky, Eric (Law)" Proshansky, Eric (Law)" Cgov Re: Justic Freeman Summary Microsoft Outlook Note Privilege (Communication (email) regarding a criminal investigation in Nort Carolian. Those communications were Privilege (Communication (email) regarding a criminal mestigation in Nort Carolian. Those communications were Privilege (Communication (email) regarding a criminal mestigation in Communication (email) regarding a criminal mestigation of Cigarette trafficking shared by Goods (Law)" Cgov (Law)" Proshansky, Eric (Law)" Cgov (Law)" Cgov (Law)" Proshansky, Eric (Law)" Cgov (Law)" Communication (email chain) regarding this (litigation (related to factual investigation of Cigarette trafficking shared by Goods (Law) (Law)" Communication (email chain) regarding this (Litigation (related to factual investigation of Cigarette trafficking shared by Goods (Law)" Communication (email chain) regarding this (Litigation (related to factual investigation of Cigarette trafficking shared by Goods (Litigation (related to factual investigation of Cigarette trafficking shared by Goods (Law)" Communication (email chain) regarding this (Litigation (related to factual investigation of Cigarette trafficking shared by Goods (Litigation (related to factual investigation of Cigarette trafficking shared by Goods (Law)" Communication (related to factual investigation of Cigarette trafficking shared by Goods (Law) (Litigation (related to factual investigation of Cigarette trafficking shared b		-					Vin <vl.tpigroup@rock< td=""><td></td><td></td><td></td><td></td><td></td><td>Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other</td><td>0</td></vl.tpigroup@rock<>						Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other	0
"Proshansky, Eric ((Law)" ((Law)" <pre>ceproshan@law.ny c.gov>; "tu, Hope Vin</pre> ((Law)" Communication (email) regarding this (litigation (related to factual investigation of Cigarettes Unlimited, Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to						Frank Brostrom <frank.brostrom@gmail.< td=""><td>"Proshansky, Eric (Law)" <pre><pre><pre><pre></pre></pre></pre></pre></td><td></td><td></td><td>y</td><td></td><td>Enforcement Privilege;Com mon Interest</td><td>Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff'to perform investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by</td><td>0</td></frank.brostrom@gmail.<>	"Proshansky, Eric (Law)" <pre><pre><pre><pre></pre></pre></pre></pre>			y		Enforcement Privilege;Com mon Interest	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff'to perform investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by	0
				-,-,		Vin	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope</eproshan@law.ny 						Communication (email) regarding this litigation (related to factual investigation of Cigarettes Unlimited, Atlantic Dominion) between Plaintiff's counsel and Vincent	

Case 2:20-cv-05965-ENV-RER Document 71-1 Filed 07/07/23 Page 3 of 23 PageID #: 1288

	A	В	С	D	E	F	G	Н	1	J	K	L	M	N	0
													Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform		
10	DMNL00241_000006160		1/3/21 19:00		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Re: Justic Freeman Summary		Microsoft Outlook Note	AWP;Law Enforcement Privilege;Com mon Interest Privilege	investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	1	image0.pn
11	DMNL00241_000006163		1/6/21 21:21		Vin Lesnak <vl.tpigroup@rocketmail .com></vl.tpigroup@rocketmail 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			DIXIE		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	o	
12	DMNL00241 000006166		1/9/21 15:27		Frank Brostrom ≺frank.brostrom@gmail. com>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Re: December Invoice Wilmington Skyhawk Services LLC		Microsoft Outlook Note	AWP;Law Enforcement Privilege;Com mon Interest Privilege	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	C	
13	DMNL00241_000006176		1/12/21 14:52		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Re: invoice		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. It also includes irrelevant discussion of other investigative matters.	O	
14	DMNL00241_000006183		1/13/21 13:13		Vin Lesnak ≺vl.tpigroup@rocketmail .com>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Re: Teresa		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiff's counsel's communications with Sebastian Kiemanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	o	
	DMNL00241_000006187		1/17/21 22:39		Frank Brostrom <frank.brostrom@gmail.com></frank.brostrom@gmail.com>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Jackpot!!		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion and FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	n	

	Α	В	C	D	E	F	G	Н	<u> </u>	J	K	L	M	N	0
16	DMNL00241_000006212		1/20/21 16:15		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Fwd: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	FreeCoSum mary001.d ocx
17	DMNL00241_000006213		1/20/21 16:15	Frank Brostrom						FreeCoSum mary001.d ocx	Microsoft 2007 Word Document	AWP	Investigative summary (related to factual investigation of Alantic Dominion, FreeCo) drafted in December 2020 for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	O	
18	DMNL00241_000006252		2/7/21 18:01		Vin <vl.tpigroup@rocketmail .com=""></vl.tpigroup@rocketmail>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	Tpi Group <pre><pre>tpigroup@rocketmail.com></pre></pre>		Re: Relevant document samples from SW - lets discuss next steps in a call.		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited, Atlantic Dominion) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	n	
	DMNL00241 000006255		2/7/21 15:32		Tpi Group <tpigroup@rocketmail.c om=""></tpigroup@rocketmail.c>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Re: Relevant document samples from SW - lets discuss next steps in a call.		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited, Atlantic Dominion) between Plaintiffs counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
	DMNL00241_000006277		5/2/21 17:22		Frank Brostrom <frank.brostrom@gmail.com></frank.brostrom@gmail.com>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov< td=""><td>м. фротовисти</td><td></td><td>Draft Summary of Interview of Cl at Fayetteville</td><td></td><td>Microsoft Outlook Note</td><td>AWP</td><td>Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.</td><td>1</td><td>WSSLLC- 2021-202- 04232021 - WitnessFJ. docx</td></hlu@law.nyc.gov<></eproshan@law.ny 	м. фротовисти		Draft Summary of Interview of Cl at Fayetteville		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC- 2021-202- 04232021 - WitnessFJ. docx
21	DMNL00241_000006278		5/2/21 17:22	Frank Brostrom						WSSLLC- 2021-202- 04232021 - WitnessFJ. docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	O	
22	DMNL00241_000006309		2/24/21 22:32		Frank Brostrom <pre><frank.brostrom@gmail. com=""></frank.brostrom@gmail.></pre>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Fwd: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	FreeCoSum mary001.d ocx
	DMNL00241_000006310		2/24/21 22:32	Frank Brostrom						FreeCoSum mary001.d	Microsoft 2007 Word Document	AWP	Investigative summary (related to factual investigation of Atlantic Dominion, FreeCo) drafted in December 2020 for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
	DMNL00241_000006311		2/24/21 22:54		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Re: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiffs counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigator et asks in connection with this and other litigation.	, a	
	DMNL00241_000006314		5/10/21 0:16		Frank Brostrom <frank.brostrom@gmail.com></frank.brostrom@gmail.com>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov< td=""><td></td><td></td><td>Re: Armstrong Grocery aka Surf Grocery Wholesale</td><td></td><td>Microsoft Outlook Note</td><td>AWP</td><td>Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.</td><td>1</td><td>Armstrong SurfGrocer y-2021- 202- 05092021 - Adel Hageb.doc</td></hlu@law.nyc.gov<></eproshan@law.ny 			Re: Armstrong Grocery aka Surf Grocery Wholesale		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Armstrong SurfGrocer y-2021- 202- 05092021 - Adel Hageb.doc

City of New York's Privilege Log (Withheld Documents), Revised 02/17/	2023

	A	В	С	D	E	F	G	Н	1	J	K	L	M	N	0
26	DMNL00241_000006315		5/10/210:16	Frank Brostrom						Armstrong SurfGrocer y-2021- 202- 05092021 - Adel Hageb.doc x	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, Armstrong) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	(0
27	DMNL00241_000006316		5/14/21 0:03		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	"Lu, Hope (Law)" ⊲hlu⊛law.nyc.gov>		Atlantic Dominion - CI Debrief on 5/8/2021		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC- 2021-202- 05082021 - WitnessFJ. 1 docx
28	DMNL00241_000006317		5/14/21 0:03	Frank Brostrom						WSSLLC- 2021-202- 05082021 - WitnessFJ. docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	(0
29	DMNL00241_000006318		5/14/210:08		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			Edited first debrief of CI on 4/23/2021		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC- 2021-202- 04232021 - WitnessFJ. 1 docx
30	DMNL00241_000006319		5/14/21 0:08	Frank Brostrom						WSSLLC- 2021-202- 04232021 - WitnessFJ. docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	(0
31	DMNL00241_000006343		6/8/21 13:17		Frank Brostrom <frank.brostrom@gmail. com=""></frank.brostrom@gmail.>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			STEVEN CRAIG CRISS		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC- 2021-202- 06072021 - Steven Craig 1 Criss.docx
32	DMNL00241_000006344		6/8/21 13:17	Frank Brostrom						WSSLLC- 2021-202- 06072021 - Steven Craig Criss.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	(0
33	DMNL00241_000006347		6/5/21 23:48		Frank Brostrom <frank.brostrom@gmail. com=""></frank.brostrom@gmail.>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	"Lu, Hope (Law)" <hlu@law.nyc.gov>; Mike Fitzpatrick -mike@fitzlawgreenville.com></hlu@law.nyc.gov>		Atlantic Dominion photographs		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC- 2021-202- 05242021 - AD Hope 1 Mills.docx
34	DMNL00241_000006348		6/5/21 23:48	Frank Brostrom						WSSLLC- 2021-202- 05242021 - AD Hope Mills.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	(0
25	DMNL00241 000006349		6/7/21 22:56		Frank Brostrom <frank.brostrom@gmail. com=""></frank.brostrom@gmail.>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov< td=""><td></td><td></td><td>Brian Bullard and Richie Freeman Interviews</td><td></td><td>Microsoft Outlook Note</td><td>AWP</td><td>Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigative.</td><td></td><td>WSSLLC- 2021-202- 06072021 - Larry R Freeman, Jr.docx; WSSLLC- 2021-202- 06072021 - Brian Bullard.do</td></hlu@law.nyc.gov<></eproshan@law.ny 			Brian Bullard and Richie Freeman Interviews		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigative.		WSSLLC- 2021-202- 06072021 - Larry R Freeman, Jr.docx; WSSLLC- 2021-202- 06072021 - Brian Bullard.do

Case 2:20-cv-05965-ENV-RER Document 71-1 Filed 07/07/23 Page 6 of 23 PageID #: 1291

	А	В	С	D	E	F	G	Н	I	J	К	L	M	N	0
36	DMNL00241_000006350		6/7/21 22:56	Frank Brostrom						WSSLLC- 2021-202- 06072021 - Larry R Freeman, Jr.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0)
37	DMNL00241_000006351		6/7/21 22:56	Frank Brostrom						WSSLLC- 2021-202- 06072021 - Brian Bullard.do cx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0)
38	DMNL00241_000006376		3/25/2116:03		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Re: Freeco		Microsoft Outlook Note	AWP;Law Enforcement Privilege;Com mon Interest Privilege	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. The email chain also includes Plaintiff's counsel's communications with 5ebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
39	DMNL00241_000006378		4/3/2116:16		Frank Brostrom ⊲frank.brostrom@gmail. com>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Re: Freeman's emails and spreadsheet		Microsoft Outlook Note	AWP;Law Enforcement Privilege;Com mon Interest Privilege	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. The email chain also includes Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in further ance of the communications were in further ance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
40	DMNL00241_000006389		4/6/21 18:28		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com="">; "Proshansky, Eric (Law)" <eproshan@law.ny c.gov=""></eproshan@law.ny></frank.brostrom@>			RE: Justin Freeman		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
41	DMNL00241_000006391		4/7/218:26		Vin <vl.tpigroup@rocketmail .com></vl.tpigroup@rocketmail 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	"Lu, Hope (Law)" <hiu@law.nyc.gov></hiu@law.nyc.gov>		Re: Altria Docs.		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0)
42	DMNL00241_000006396		4/6/21 20:01		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>		Re: Justin Freeman		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiffs counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

City of New York's Privilege Log (Withheld Documents)	, Revised 02/17/2023

Г	Α	В	С	D	E	F	G	Н		J	К	L	M	N	0
43	DMNL00241_000010028	NYC_0009267	3/5/21 11:10		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" c.gov>			Fwd: Justic Freeman Summary		Microsoft Outlook Note	AWP;Common Interest Privilege	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiffs counsel and Frank Brostrom, an investigator engaged by Plaintiffs to perform investigative tasks in connection with this and other litigation. Plaintiffs "s counsel shared this communication and/or document with Sebastian Kilemanovich, a federal law enforcement official, in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
44	DMNL00241_000010029	NYC_0009268	3/5/21 11:10	Frank Brostrom						FreeCoSum mary001.d ocx	Microsoft 2007 Word Document	AWP;Common Interest Privilege	Investigative summary (related to factual investigation of Atlantic Dominion, FreeCo) drafted in December 2020 for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
45	DMNL00241_000010121		12/16/20 23:39		"proshansky, eric (law)"	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 			Re: Atlantic Dominion		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
46	DMNL00241_000010199		2/6/21 10:50		"proshansky, eric (law)"	"Vince Lesnak (vl.tpigroup@rock etmail.com)" <vl.tpigroup@rock etmail.com>; tpigroup@rocketm ail.com</vl.tpigroup@rock 			CU Files		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Cigarettes Unimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
47	DMNL00241_000010204		2/7/21 14:57		"proshansky, eric (law)"	Tpi Group <tpigroup@rocket mail.com></tpigroup@rocket 	Vin Lesnak <vl.tpigroup@rocketmail.com></vl.tpigroup@rocketmail.com>		Re: Relevant document samples from SW - lets discuss next steps in a call.		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited, Atlantic Dominion) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
48	DMNL00241_000010234	NYC_0009462	5/2/21 10:49		"proshansky, eric (law)"	Tpi Group <tpigroup@rocket mail.com></tpigroup@rocket 	"Vince Lesnak (vi.tpigroup@rocketmail.com)" <vi.tpigroup@rocketmail.com></vi.tpigroup@rocketmail.com>		FW:		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	7	37.pdf; 37- 1.pdf; 37- 2.pdf; 37- 3.pdf; 37- 4.pdf; 37- 5.pdf; CU Mem of law.pdf
49	DMNL00241_000010242		2/24/21 22:48		"proshansky, eric (law)"	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 			Re: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
50	DMNL00241_000010266	NYC 0009559	3/5/2111:11		Frank Brostrom <frank.brostrom@gmail. com=""></frank.brostrom@gmail.>	"Proshansky, Eric (Law)" <egov></egov>			Fwd: Justic Freeman Summary		Microsoft Outlook Note	AWP;Common Interest Privilege	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiffs counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Plaintiffac [™] s counsel shared this communication and/or document with Sebastian Kielmanovich, a federal law enforcement official, in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	n	

Case 2:20-cv-05965-ENV-RER Document 71-1 Filed 07/07/23 Page 8 of 23 PageID #: 1293

	A	В	С	D	E	F	G	Н	1	1	K	L	M	N	0
51	DMNL00241_000010267		3/5/21 11:11	Frank	-	·	J			FreeCoSum mary001.d ocx	Microsoft 2007 Word Document	AWP;Common Interest Privilege	Investigative summary (related to factual investigation of Atlantic Dominion, FreeCo) drafted in December 2020 for purposes of this Ittigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other Ittigation.		
52	DMNL00241_000010283		3/25/21 11:34		"proshansky, eric (law)"	Frank Brostrom <frank.brostrom@ gmail.com@<="" td=""><td></td><td></td><td>FW: Freeco</td><td></td><td>Microsoft Outlook Note</td><td>Law Enforcement Privilege;Com mon Interest Privilege</td><td>Communication (email) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. The email chain also includes Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carollina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.</td><td>C</td><td></td></frank.brostrom@>			FW: Freeco		Microsoft Outlook Note	Law Enforcement Privilege;Com mon Interest Privilege	Communication (email) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. The email chain also includes Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carollina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	C	
	DMNL00241_000010294		3/26/21 10:15		"proshansky, eric (law)"	"Vince Lesnak (vl.tpigroup@rock etmail.com)" <vl.tpigroup@rock etmail.com="">; Tpi Group <tbgroup@rocket mail.com=""></tbgroup@rocket></vl.tpigroup@rock>			Jeff Smith III		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0)
54	DMNL00241_000010305		3/26/21 10:24		"proshansky, eric (law)"	Vin Lesnak <vl.tpigroup@rock etmail.com>; Tpi Group <tpigroup@rocket mail.com></tpigroup@rocket </vl.tpigroup@rock 			RE: this may be our guy to talk to re AD		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	O)
55	DMNL00241_000010315		4/6/21 19:09		"proshansky, eric (law)"	"Lu, Hope (Law)" <hlu@law.nyc.gov>; "Vince Lesnak (vl.tpigroup@rock etmail.com)" <vl.tpigroup@rock etmail.com=""></vl.tpigroup@rock></hlu@law.nyc.gov>			Altria Docs.		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	O)
	DMNL00241_000010360		6/13/21 16:42		"proshansky, eric (law)"	"Lu, Hope (Law)" <hiu@law.nyc.gov< td=""><td></td><td></td><td>[No Subject]</td><td></td><td>Microsoft Outlook Note</td><td>ACC</td><td>Communication between Plaintiff's counsel regarding this litigation.</td><td></td><td>STEVEN CRAIG CRISS; WSSLLC- 2021-202- 06072021- Steven Craig Criss.docx; Brian Bullard and Richer Freeman Interviews; WSSLLC- 2021-202- 06072021- Larry R Freeman, Jr.docx; WSSLLC- 2021-202- Brian Bullard.do</td></hiu@law.nyc.gov<>			[No Subject]		Microsoft Outlook Note	ACC	Communication between Plaintiff's counsel regarding this litigation.		STEVEN CRAIG CRISS; WSSLLC- 2021-202- 06072021- Steven Craig Criss.docx; Brian Bullard and Richer Freeman Interviews; WSSLLC- 2021-202- 06072021- Larry R Freeman, Jr.docx; WSSLLC- 2021-202- Brian Bullard.do

				D			G				1 1	M		0
					-	"Proshansky, Eric	G		,	K		Communication (email) regarding this	IN	
					Frank Brostrom <frank.brostrom@gmail.< td=""><td>(Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov< td=""><td></td><td></td><td></td><td></td><td></td><td>litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this</td><td></td><td></td></hlu@law.nyc.gov<></eproshan@law.ny </td></frank.brostrom@gmail.<>	(Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov< td=""><td></td><td></td><td></td><td></td><td></td><td>litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this</td><td></td><td></td></hlu@law.nyc.gov<></eproshan@law.ny 						litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this		
7 DMNL00	0241_000010361		6/13/21 16:42		com>	>		STEVEN CRAIG CRISS	1	Microsoft Outlook Note	AWP	and other litigation.	0	
58 DMNL00	0241_000010362		6/13/21 16:42	Frank Brostrom					WSSLLC- 2021-202- 06072021 - Steven Craig Criss.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
59 DMNL00	0241_000010363		6/13/21 16:42		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 		Brian Bullard and Richie Freeman Interviews		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
50 DMNL00	0241_000010364		6/13/21 16:42	Frank Brostrom					WSSLLC- 2021-202- 06072021 - Larry R Freeman, Jr.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
	0241_000010365		6/13/21 16:42	Frank					WSSLLC- 2021-202- 06072021 - Brian	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
52 DMNL00	0241_000012366		2/7/21 15:35		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	Tpi Group <tpigroup@rocket mail.com></tpigroup@rocket 	Vin Lesnak ≺vl.tpigroup@rocketmail.com>	RE: Relevant document samples from SW - lets discuss next steps in a call.		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited, Atlantic Dominion) between Plaintiffs counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
	0241 <u>00001241</u> 7	NYC_0009685	3/5/21 11:11		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" ceproshan@law.ny c.gov>		Fwd: Justic Freeman Summary		Microsoft Outlook Note	AWP;Common Interest Privilege	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiffs counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Plaintiffs "s counsel shared this communication and/or document with Sebastian Kielmanovich, a federal law enforcement official, in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
54 DMNL00	0241_000012418	NYC_0009686	3/5/21 11:11	Frank Brostrom					FreeCoSum mary001.d ocx	Microsoft 2007 Word Document	AWP;Common Interest Privilege	Investigative summary (related to factual investigation of Atlantic Dominion, FreeCo) drafted in December 2020 for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
	0241 000012465		3/26/21 10:12		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdft)/cn=rec ipients/cn=eproshan">	"Vince Lesnak (vl.tpigroup@rock etmail.com)" <vl.tpigroup@rock etmail.com>; Tpi Group <tpigroup@rocket mail.com></tpigroup@rocket </vl.tpigroup@rock 		this may be our guy to talk t	0	Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

	A	В	С	D	E	F	G	Н	1	J	K	L	M	N	0
	A	8	C	D	E	F	G	Н		J	K	L	М	N	O STEVEN CRAIG CRISS; WSSLLC- 2021-202- 06072021- Steven Craig Criss, docx; Brian Bullard and Richie Freeman Interviews; WSSLLC- 2021-202- 2021-202- Larry R Freeman
66	DMNL00241_000012484		6/13/21 16:42		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 			[No Subject]		Microsoft Outlook Note	ACC	Communication between Plaintiff's counsel regarding this litigation.	5	Jr.docx; WSSLLC- 2021-202- 06072021 - Brian Bullard.do
	DMNL00241_000012485		6/13/21 16:42		Frank Brostrom <pre><frank.brostrom@gmail.com></frank.brostrom@gmail.com></pre>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			STEVEN CRAIG CRISS		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	
			6/13/21 16:42	Frank						WSSLLC- 2021-202- 06072021 - Steven Craig Criss.docx	Microsoft 2007 Word	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	
69	DMNL00241_000012487		6/13/21 16:42		Frank Brostrom <frank.brostrom@gmail.com></frank.brostrom@gmail.com>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov< td=""><td></td><td></td><td>Brian Bullard and Richie Freeman Interviews</td><td></td><td>Microsoft Outlook Note</td><td>AWP</td><td>Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.</td><td>ſ</td><td></td></hlu@law.nyc.gov<></eproshan@law.ny 			Brian Bullard and Richie Freeman Interviews		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	ſ	
	DMNL00241_000012488		6/13/21 16:42	Frank						WSSLLC- 2021-202- 06072021 - Larry R Freeman, Jr.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	
71	DMNL00241_000012489		6/13/21 16:42	Frank Brostrom						WSSLLC- 2021-202- 06072021 - Brian Bullard.do cx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	C)
72	DMNL00241_000012495		7/21/21 15:15		"Lu, Hope (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=lu hopeb26">	"Lu, Hope (Law)" <hluelaw.nyc.gov>; "Proshansky, Eric (Law)" <proshan@law.ny c.gov="">; Frank Brostrom <frank.brostrom@ gmail.com=""></frank.brostrom@></proshan@law.ny></hluelaw.nyc.gov>			Atlantic Dominion re Herring		Microsoft Outlook Appointment	AWP	Communication (calendar invitation) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.		3
73	DMNL00241_000012702		2/6/21 12:00		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	Tpi Group <tpigroup@rocket mail.com></tpigroup@rocket 	"Vince Lesnak (vi.tpigroup@rocketmail.com)" <vi.tpigroup@rocketmail.com></vi.tpigroup@rocketmail.com>		RE: CU Files		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	

	A	В	С	D	E	F	G	Н	I	J	К	L	M	N	0
74	DMNL00241_000012735	NYC_0009772	3/5/21 11:10		Frank Brostrom ⊲frank.brostrom@gmail. com>	"Proshansky, Eric (Law)" eeproshan@law.ny c.gov>			Fwd: Justic Freeman Summary		Microsoft Outlook Note	AWP;Common Interest Privilege	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiffs counsel and Frank Brostrom, an investigator engaged by Plaintiffs Counsel and other litigation. Plaintiffe "se counsel shared this communication and/or document with Sebastian Kielmanovich, a federal law enforcement official, in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
75	DMNL00241_000012736	NYC_0009773	3/5/21 11:10	Frank Brostrom						FreeCoSum mary001.d ocx	Microsoft 2007 Word Document	AWP;Common Interest Privilege	Investigative summary (related to factual investigation of Atlantic Dominion, FreeCo) drafted in December 2020 for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
76	DMNL00241_000012820		10/23/20 11:01		administrative group (fydibohf23spdlt)/cn=rec	"Vince Lesnak (vl.tpigroup@rock etmail.com)" <vl.tpigroup@rock etmail.com></vl.tpigroup@rock 			FW: List of Stores		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Bonnie's Bounty, Cigarettes Unlimited, Village Tobacco) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
77	DMNL00241_000012879		1/5/21 20:44		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	Vin <vl.tpigroup@rock etmail.com></vl.tpigroup@rock 	"Lu, Hope (Law)" <nlu@law.nyc.gov></nlu@law.nyc.gov>		Re: Comments from Tom on the interviews		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited, Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
78	DMNL00241_000012896		1/17/21 22:54		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 			Re: Jackpot!!		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion and FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
79	DMNL00241_000012897		1/18/21 11:47		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 			RE: Atlantic Dominion Case		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion and FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
80	DMNL00241_000012899		1/18/2113:10		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 			RE: Highlights of the Biggest Cases under Altria Contract		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion and FreeCo) between Plaintiff scounsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiffs counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
81	DMNL00241_000012900		1/18/21 15:44		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec	Frank Brostrom			Re: Highlights of the Biggest Cases under Altria Contract		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

	A B	C D	E	F	G	H I	J K	L	M	N	0
82	DMNL00241_000013144	9/1/219:03	"/o=exchangelabs/ou=exc hange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=67422df4e99 34c3b8884f3506eaf22d 7-proshansky,"			RE: Atlantic Dominion	Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	0
83	DMNL00241_000013191	9/1/219:11	"/o=exchangelabs/ou=exc hange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=67422df4e99 34c3b8884f3506eaf22d 7-proshansky,"	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 		RE: Justic Freeman Summary	Microsoft Outlook Note	AWP;Law Enforcement Privilege;Com mon Interest Privilege	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0)
84	DMNL00241_000013201	4/6/21 18:59		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Lu, Hope(Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Re: Justin Freeman	Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0)
85	DMNL00241_000013207	4/11/21 13:53		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 		Re: Justin Freeman	Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
86	DMNL00241 000013208	4/11/21 13:54		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Lu, Hope (Law)" <a hlu@law.nyc.gov="">	Re: FreeCoSummary001.docx	Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
87	DMNL00241_000013210	4/12/21 9:04		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.com></frank.brostrom@gmail.com>	Re: Some preliminary questions from the Intel Reports.	Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
88	DMNL00241 000013220	4/24/21 10:49		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 		Re: Shareef Hasan	Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Also includes irrelevant discussion of other investigative matters.	0	
	DMNL00241_000013225	5/2/21 18:42		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 		Re: Draft Summary of Interview of CI at Fayetteville	Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
90	DMNL00241_000013282	4/11/21 22:54	"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group	"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom ⊲frank.brostrom@gmail.com>	Re: Some preliminary questions from the Intel Reports.	Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
91	DMNL00241_000013288	4/12/21 10:22	<"/o=cs hosting/ou=exchange	Frank Brostrom <frank.brostrom@ gmail.com>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </frank.brostrom@ 		RE: Updated Interview Questions	Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	,

City of New York's Privilege Log ()	Withheld Documents).	Revised 02/17/2	023

A	В	С	D	E	F	G	Н	J	К	L	M	N	0
				"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec	Frank Brostrom <frank.brostrom@ gmail.com>; "Lu, Hope (Law)" <hlu@law.nyc.gov< td=""><td></td><td></td><td></td><td></td><td></td><td>Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other</td><td></td><td></td></hlu@law.nyc.gov<></frank.brostrom@ 						Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other		
92 DMNL00241_000013289		4/13/21 15:13		ipients/cn=eproshan">	>		RE: AD		Microsoft Outlook Note	AWP	litigation.	0	
93 DMNL00241_000013304		7/14/21 13:23			Vin Lesnak <vl.tpigroup@rock etmail.com></vl.tpigroup@rock 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	RE: Altria Second Response Re: NYC RFI Dated February 3, 2021		Microsoft Outlook Note	AWP	Communication regarding this littigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
94 DMNL00241_000013321		4/19/21 16:51		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	Frank Brostrom <frank.brostrom@ gmail.com>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </frank.brostrom@ 		RE: Freeman Interview		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
95 DMNL00241_000013325		7/19/21 23:08		eproshan@law.nyc.gov	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Lu, Hope (Law)" <a <="" href="http://www.igov>" td=""><td>Re: Bullard Interview RE Charles</td><td></td><td>Microsoft Outlook Note</td><td>AWP</td><td>Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.</td><td>0</td><td></td>	Re: Bullard Interview RE Charles		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
96 DMNL00241 000013336		4/24/218:56		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=ec ipients/cn=eproshan">	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 		Re: Shareef Hasan		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Also includes irrelevant discussion of other investigative matters.	0	
97 DMNL00241_000013458		5/2/21 12:11		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	Tpi Group <tpigroup@rocket mail.com></tpigroup@rocket 	Vin <vi.tpigroup@rocketmail.com></vi.tpigroup@rocketmail.com>	Re:		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
98 DMNL00241_000013471		5/2/21 12:42		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	Tpi Group <tpigroup@rocket mail.com></tpigroup@rocket 	Vin <vl.tpigroup@rocketmail.com></vl.tpigroup@rocketmail.com>	RE:		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
99 DMNL00241_000013480		11/3/21 13:28		"Proshansky, Eric (Law)" <"/o=exchangelabs/ou=ex change administrative group (fydibohf23spdlt)/cn=rec ipients/cn=67422df4e99 34c3b8884f3506eaf22d 7-proshansky,">	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 		RE: [EXTERNAL] Fwd: Justin Freeman		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
100 DMNL00241_000013496		5/3/217:21		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Re: Suggested Search Criteria via MFiles		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
101 DMNL00241_000013497		11/23/219:53		"Proshansky, Eric (Law)" <"/o-exchangelabs/ou=ex change administrative group (fydibohf23spdlt)/cn=rec ipients/cn=67422df4e99 34c3b8884f3506eaf22d 7-proshansky,">	Frank Brostrom <frank.brostrom@ gmail.com>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </frank.brostrom@ 		Re: [EXTERNAL] Email		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

A	В	C	D	E	F	G	Н	1	J	К	L	M	N	0
102 DMNL00241_000013540		2/1/22 22:16		"Proshansky, Eric (Law)" <"/o-exchangelabs/ou=ex change administrative group (fydibohf23spdlt)/cn=rec ipients/cn=67422df4e99 34c3b8884f3506eaf22d 7-proshansky,">	Frank Brostrom <frank.brostrom@ gmail.com>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </frank.brostrom@ 			Re: [EXTERNAL] Justin Freeman		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	0
103 DMNL00241_000013572		5/10/218:05		eproshan@law.nyc.gov	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Lu, Hope (Law)" <hiu@law.nyc.gov></hiu@law.nyc.gov>		Re: Armstrong Grocery aka Surf Grocery Wholesale		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	0
104 DMNL00241_000013573		5/7/21 17:30		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	Tpi Group <tpigroup@rocket mail.com></tpigroup@rocket 	Vin Lesnak <vl.tpigroup@rocketmail.com></vl.tpigroup@rocketmail.com>		RE: Riley		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	ſ	0
105 DMNL00241_000013578		5/10/21 11:06		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Lu, Hope (Law)" https://doi.org/10.2012/j.j.co.2012/j.	****	RE: Armstrong Grocery aka Surf Grocery Wholesale		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	0
106 DMNL00241_000013587		5/13/21 13:48		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=exchange administrative group (fydibohf23spdlt)/cn=rec ipients/cn=eproshan">	Tpi Group <tpigroup@rocket mail.com></tpigroup@rocket 	"Vince Lesnak (vl.tpigroup@rocketmail.com)" «vl.tpigroup@rocketmail.com>; "Lu, Hope (Law)" «hlu@law.nyc.gov>		RE: Highlights of call with Riley and his attorney Alex		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	0
107 DMNL00241 000013770		4/11/21 13:43		Frank Brostrom <frank.brostrom@gmail.com></frank.brostrom@gmail.com>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			FreeCoSummary001.docx		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	2	FreeCoSum mary001.d ocx; ATT00001.
108 DMNL00241_000013771		4/11/21 13:43	Frank Brostrom						FreeCoSum mary001.d ocx	Microsoft 2007 Word Document	AWP	Investigative summary (related to factual investigation of Atlantic Dominion, FreeCo) drafted in December 2020 for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	0
109 DMNL00241_000013798		4/11/21 15:11		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			Some preliminary questions from the Intel Reports.		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Justin Freeman Interview Questions. 1 docx
110 DMNL00241_000013799		4/11/21 15:11	Frank Brostrom						Justin Freeman Interview Questions. docx	Microsoft 2007 Word Document	AWP	Document (draft interview questions) related to this litigation (related to factual investigation of FreeCo, Atlantic Dominion) prepared and/or provided by Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	0
111 DMNL00241_000013808		4/12/218:20		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	Frank Brostrom <frank.brostrom@gmail.com></frank.brostrom@gmail.com>		Re: Some preliminary questions from the Intel Reports.		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	0

City of New York's Privilege Log	(Withheld Documents)	, Revised 02/17/2023

A	В	С	D	E	F	G	Н	1	J	K	L	M	N	0
12 DMNL00241_000013816		4/12/21 10:21		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			Updated Interview Questions		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Justin Freeman Interview Questions.
13 DMNL00241_000013817		4/12/21 10:21	Frank Brostrom						Justin Freeman Interview Questions. docx	Microsoft 2007 Word Document	AWP	Document (draft interview questions) related to this litigation (related to factual investigation of FreeCo, Atlantic Dominion) prepared and/or provided by Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C)
14 DMNL00241_000013823		4/12/21 23:54		Frank Brostrom <frank.brostrom@gmail. com=""></frank.brostrom@gmail.>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			Freeman Interview		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Justin Freeman Interview0 4122021.d
15 DMNL00241_000013824		4/12/21 23:54	Frank Brostrom						Justin Freeman Interview0 4122021.d ocx	Microsoft 2007 Word Document	AWP	Document (interview notes) related to this litigation (related to factual investigation of FreeCo, Atlantic Dominion) prepared and/or provided by Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C)
16 DMNL00241_000013833		4/18/218:27		"Lu, Hope (Law)" <ກ່ເມ@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com>; "Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny </frank.brostrom@ 			RE: Freeman Interview		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Justin Freeman Interview0 4122021 w Law_s comments - (#Legal 11693848)
17 DMNL00241 000013834		4/18/21 8:27	Frank Brostrom						Justin Freeman Interview0 4122021 w Law_s comments- (#Legal 11693848) .DOCX	Microsoft 2007 Word Document	AWP	Document (interview notes) related to this litigation (related to factual investigation of FreeCo, Atlantic Dominion) prepared and/or provided by Frank Brostrom, an investigation engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Also includes notes and work product of Plaintiff's councils.		
18 DMNL00241_000013840		4/19/21 17:49		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com=""></frank.brostrom@>	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		RE: Freeman Interview		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Palantiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.		
19 DMNL00241 000013845		4/24/21 8:35		Frank Brostrom <frank.brostrom@gmail. com=""></frank.brostrom@gmail.>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	-		Re: Shareef Hasan		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Also includes irrelevant discussion of other investigative matters.	(
20 DMNL00241_000013847		4/27/219:54		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com="">; "Proshansky, Eric (Law)" <eproshan@law.ny c.gov=""></eproshan@law.ny></frank.brostrom@>			RE: Summary		Microsoft Outlook Note	AWP	Communication (email Chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	

A		В	С	D	E	F	G	Н	1	J	K	L	M	N	0
121 DMNL00241_0	00013850		4/27/21 18:36		"Lu, Hope(Law)" https://hiteglaw.nyc.gov	Frank Brostrom <frank.brostrom@ gmail.com=""></frank.brostrom@>	"Proshansky, Eric (Law)" <pre><pre>ceproshan@law.nyc.gov></pre></pre>		RE: Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Justin Freeman Interview0 4122021 w Law_s comments - (# Legal 11693848) .DOCX
122 DMNL00241_0	00013851		4/27/21 18:36	Frank Brostrom						Justin Freeman Interview0 4122021 w Law_s comments- (#Legal 11693848) .DOCX	Microsoft 2007 Word Document	AWP	Document (interview notes) related to this litigation (related to factual investigation of FreeCo, Atlantic Dominion) prepared and/or provided by Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Incorporates attorney work product from Plaintiff's Counsel.	o	
123 DMNL00241_0	00013853		4/27/21 19:22		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		Re: Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
124 DMNL00241_0	00013858		5/2/21 11:19		Tpi Group <tpigroup@rocketmail.c om></tpigroup@rocketmail.c 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	"Vince Lesnak (vi.tpigroup@rocketmail.com)" <vi.tpigroup@rocketmail.com></vi.tpigroup@rocketmail.com>		Re: Re:		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	o	
125 DMNL00241_0	00013859		5/2/21 11:48		Vin <vl.tpigroup@rocketmail .com></vl.tpigroup@rocketmail 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	Tpi Group <pre><pre><pre>dpigroup@rocketmail.com></pre></pre></pre>		Re:		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	O	
126 DMNL00241_0	00013861		5/2/21 12:34		Tpi Group <tpigroup@rocketmail.c om></tpigroup@rocketmail.c 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	Vin <vl.tpigroup@rocketmail.com></vl.tpigroup@rocketmail.com>		Re:		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	O	
127 DMNL00241_0	00013867		5/2/21 23:31		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Re: Draft Summary of Interview of CI at Fayetteville		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	o	
128 DMNL00241_0	00013868		5/2/21 23:25		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	"Proshansky, Eric (Law)" <pre><pre>ceproshan@law.nyc.gov></pre></pre>		Re: Draft Summary of Interview of CI at Fayetteville		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	O	
129 DMNL00241_0	00013869	NYC_0010435	5/2/21 23:44		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			EIS Report ATF 042619.docx		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	2	EIS Report ATF 042619.do cx; ATT00001. txt
130 DMNL00241_0	00013875		5/3/21 9:20		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com="">; "Proshansky, Eric (Law)" <eproshan@law.ny c.gov=""></eproshan@law.ny></frank.brostrom@>			RE: Suggested Search Criteria via MFiles		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

	Α	В	С	D	E	F	G	Н	I	J	К	L	M	N	0
131	DMNL00241_000013890		5/5/21 14:01		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		RE: Draft Summary of Interview of CI at Fayetteville		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
132	DMNL00241_000013891		5/6/21 17:50		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com>; "Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny </frank.brostrom@ 			RE: EIS Report ATF 042619.docx		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
133	DMNL00241_000013906		5/10/21 9:55		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Re: Armstrong Grocery aka Surf Grocery Wholesale		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
134	DMNL00241_000013915		5/14/210:05		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com>; "Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny </frank.brostrom@ 			RE: Atlantic Dominion - Cl Debrief on 5/8/2021		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0)
135	DMNL00241_000013917		5/14/21 15:01		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Re: Edited first debrief of Cl on 4/23/2021		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
136	DMNL00241_000013922		5/24/218:49		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		Jennifer		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
137	DMNL00241_000013923		5/24/21 11:29		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		Re: Jennifer		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
138	DMNL00241 000013924		5/24/21 12:37		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com=""></frank.brostrom@>	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		Privileged communication re Atlantic Dominion		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Salkeld Declaratio n - 5-24- 2021 - (# Legal 11795813)
	DMNL00241_000013925		5/24/21 12:37	eproshan						Salkeld Declaratio n - 5-24- 2021 - (# Legal 11795813) .DOCX	Microsoft 2007 Word	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0)
140	DMNL00241_000013927		5/24/21 14:22		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		RE: Privileged communication re Atlantic Dominion		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Salkeld Declaratio n - 5-24- 2021 - final - (# Legal 11796654) L.docx

	A	В	С	D	E	F	G	Н	1	J	K	L	M	N	0
141 DM	MNL00241_000013928		5/24/21 14:22	eproshan							Microsoft 2007 Word Document	AWP	Draft of document for filling in this litigation prepared by Plaintiffs counsel.	O	0
142 DM	MNL00241_000013929		5/24/21 13:02		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		RE: Privileged communication re Atlantic Dominion		Microsoft Outlook Note	AWP		1	Updated Salkeld Declaratio n - 5-24- 2021 - (# Legal 11795813)
143 DM	MNL00241_000013930		5/24/21 13:02	eproshan							Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	o	
144 DM	NNL00241_000013938		5/26/21 10:10		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>		Re: Salkeld Declaration		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	c	
145 <u>DM</u>	MNL00241_000013949		6/4/21 11:41		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com>; "Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny </frank.brostrom@ 			Freeman (confidential and privileged)		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Freeman Declaratio n (AD) - draft - 6-4- 2021 - (# Legal 11829540) 1 .DOCX
146 DM	MNL00241_000013950		6/4/21 11:41	eproshan							Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	
	/NL00241_000013951		6/4/21 13:45		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		Re: Freeman (confidential and privileged)		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	o	
148 DM	MNL00241_000013952		6/4/21 13:41		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		Re: Freeman (confidential and privileged)		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	o)
149 DM	MNL00241_000013955		7/6/21 10:26		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com>; "Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny </frank.brostrom@ 			Atlantic Dominion - FJ [confidential/privileged]		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	2	Salkeld Declaratio n - 7-6- 2021 - CLEAN.doc x; Salkeld Declaratio n - 7-6- 2021 - REDLINE.d

City of New York v. Old Dominion Tobacco Company, Inc., 20 Civ 5965 (ENV-RER) (E.
City of Nov. Varies Drivilage Lea (Mithheld Decuments). Deviced 02/17/2022

	Α	В	С	D	E	F	G	Н	I	J	К	L	M	N	0
150	DMNL00241_000013956		7/6/21 10:26	eproshan						Salkeld Declaratio n - 7-6- 2021 - CLEAN.doc x	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0)
	DMNL00241_000013957		7/6/21 10:26							Salkeld Declaratio n - 7-6- 2021 - REDLINE.d ocx	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0)
	DMNL00241_000013958		7/6/21 11:53		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	"Proshansky, Eric (Law)" <eproshan@law.ny <e.gov>; Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ </e.gov></eproshan@law.ny 			Atlantic Dominion - Freeman (confidential/privileged)		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Atlantic Dominion - Freeman Declaratio n - 7-6- 2021.docx
153	DMNL00241_000013959		7/6/21 11:53	eproshan						Atlantic Dominion - Freeman Declaratio n - 7-6- 2021.docx	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	
154	DMNL00241_000013963		7/6/21 20:21		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com>; "Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny </frank.brostrom@ 			RE: Atlantic Dominion - FJ [confidential/privileged]		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Salkeld Declaratio n - 7-6- 2021 - CLEAN.doc
155	DMNL00241_000013964		7/6/21 20:21	eproshan						Salkeld Declaratio n - 7-6- 2021 - CLEAN.doc x	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	J
156	DMNL00241_000013965		7/7/219:28		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		RE: Atlantic Dominion - FJ [confidential/privileged]		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
					"Lu, Hope (Law)"	Frank Brostrom <frank.brostrom@< td=""><td>"Proshansky, Eric (Law)"</td><td></td><td>Atlantic Dominion</td><td></td><td></td><td></td><td>Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this</td><td></td><td>Brian Bullard Declaratio n -7-12- 2021.docx; Larry %22Richie %22 Freeman Declaratio n -7-12- 2021.docx; Salkeld Declaratio n -7-12-</td></frank.brostrom@<>	"Proshansky, Eric (Law)"		Atlantic Dominion				Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this		Brian Bullard Declaratio n -7-12- 2021.docx; Larry %22Richie %22 Freeman Declaratio n -7-12- 2021.docx; Salkeld Declaratio n -7-12-
	DMNL00241_000013970 DMNL00241_000013971		7/12/217:17 7/12/217:17	eproshan	<hlu@law.nyc.gov></hlu@law.nyc.gov>	gmail.com>	<eproshan@law.nyc.gov></eproshan@law.nyc.gov>		[confidential/privileged]	Brian Bullard Declaratio n - 7-12- 2021.docx	Microsoft Outlook Note Microsoft 2007 Word Document	AWP	and other litigation. Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	2021 .docx
	DMNL00241_000013972		7/12/21 7:17							Larry %22Richie %22 Freeman Declaratio n - 7-12-	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	

	A	В	С	D	E	F	G	Н	1	J	К	L	M	N	0
160	DMNL00241_000013973		7/12/21 7:17	eproshan						Salkeld Declaratio n - 7-12- 2021 .docx	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	C)
161	DMNL00241_000013974		7/12/219:26		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		RE: Atlantic Dominion [confidential/privileged]		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C)
162	DMNL00241_000013986		7/14/21 13:06		Vin Lesnak <vl.tpigroup@rocketmail .com></vl.tpigroup@rocketmail 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>		Re: Altria Second Response Re: NYC RFI Dated February 3, 2021		Microsoft Outlook Note	AWP	Communication regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiffs counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	
163	DMNL00241_000014160		7/19/219:36		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com>; "Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny </frank.brostrom@ 			RE: Declarations		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	
164	DMNL00241 000014161		7/19/21 23:06		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com="">; "Proshansky, Eric (Law)" <eproshan@law.ny c.gov=""></eproshan@law.ny></frank.brostrom@>			RE: Bullard Interview RE Charles		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	
	DMNL00241_000014166		7/19/21 22:59		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			Bullard Interview RE Charles		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC- 2021-202- 07182021 - Brian Bullard.do
166	DMNL00241_000014167		7/19/21 22:59	Frank Brostrom						WSSLLC- 2021-202- 07182021 - Brian Bullard.do cx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	
167	DMNL00241_000014190		7/30/21 23:21		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			Declaration for Charles Herring		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Atlantic Dominion - Herring Declaratio n - 7-30- 2021 I Final.docx
168	DMNL00241_000014191		7/30/21 23:21	eproshan						Atlantic Dominion - Herring Declaratio n - 7-30- 2021 Final.docx	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	
	DMNL00241_000014192		7/30/21 23:53		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	Frank Brostrom <frank.brostrom@gmail.com></frank.brostrom@gmail.com>		Re: Declaration for Charles Herring		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiffs counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	C	
	DMNL00241_000014194		7/31/21 12:48		Frank Brostrom <frank.brostrom@gmail.com></frank.brostrom@gmail.com>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov< td=""><td></td><td></td><td>Updated Declaration 7/31/21 12:47 pm</td><td></td><td></td><td>AWP</td><td>Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiffs counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.</td><td></td><td>Atlantic Dominion - Herring Declaratio n - 7-30- 2021 I Final.docx</td></hlu@law.nyc.gov<></eproshan@law.ny 			Updated Declaration 7/31/21 12:47 pm			AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiffs counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.		Atlantic Dominion - Herring Declaratio n - 7-30- 2021 I Final.docx

city of rect fork v. old Dollmillon robucco	company, men, 20 err 3303 (err men, (erb.
City of New York's Privilege Log (Wi	ithheld Documents) Revised 02/17/2023

A	В	С	D	E	F	G	Н	I	J	К	L	M	N	0
171 <u>DMNL00241_000014195</u>		7/31/21 12:48	eproshan						Atlantic Dominion - Herring Declaratio n - 7-30- 2021 Final.docx	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	(0
172 DMNL00241_000014196		7/31/21 20:45		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		Atlantic Dominion - CH		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiffs counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Atlantic Dominion - Herring Declaratio n - 7-30- 2021 FINAL CLEAN.doc
173 DMNL00241_000014197		7/31/21 20:45	eproshan						Atlantic Dominion - Herring Declaratio n - 7-30- 2021 FINAL CLEAN.doc x	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	(0
174 DMNL00241_000014199		8/1/219:16		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			Re: Atlantic Dominion - CH		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	(ם
175 DMNL00241_000014200		8/1/213:33		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			Full Report and Details		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC- 2021-202- 07302021 - Charles Herring 1 .docx
176 DMNL00241_000014201		8/1/213:33	Frank Brostrom						WSSLLC- 2021-202- 07302021 - Charles Herring .docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo, Armstrong) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	(0
177 DMNL00241_000014202		8/1/21 9:30		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 	Frank Brostrom <frank.brostrom@gmail.com></frank.brostrom@gmail.com>		Final Dec Herring		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Atlantic Dominion - Herring Declaratio n - 8-01- 2021 1 FINAL.docx
178 <u>DMNL00241_000014203</u>		8/1/219:30	eproshan						Atlantic Dominion - Herring Declaratio n - 8-01- 2021 FINAL.docx	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	(0
179 DMNL00241_000014204		8/2/219:46		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ </eproshan@law.ny 			RE: Herring Declaration		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	(٥

	A	В	С	D	E	F	G	Н	1	J	K	L	M	N	0
180	DMNL00241_000014205		8/2/21 17:03		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	"Proshansky, Eric (Law)" <pre>ceproshan@law.nyc.gov></pre>		Re: Herring Declaration		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	(
181	DMNL00241_000014208		8/3/21 16:15		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		Atlantic Dominion - CH		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Atlantic Dominion - Herring Declaratio n - 8-3- 2021 FINAL with typos corrected REDLINE.d ocx
182	DMNL00241_000014209		8/3/21 16:15	eproshan						Atlantic Dominion - Herring Declaratio n - 8-3- 2021 FINAL with typos corrected REDLINE.d ocx	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	(
183	DMNL00241_000014224		8/4/21 23:58		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			Herring Detailed Report edited - final		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC- 2021-202- 07302021 - Charles Herring docx
184	DMNL00241_000014225		8/4/21 23:58	Frank Brostrom						WSSLLC- 2021-202- 07302021 - Charles Herring .docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo, Armstrong) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	(1
185	DMNL00241_000014226		8/5/21 0:49		Frank Brostrom <frank.brostrom@gmail. com=""></frank.brostrom@gmail.>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			Follow up telcall with Witness Charles Herring on 8/4/2021		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC- 2021-202- 08042021 - Charles Herring002 .docx
186	DMNL00241_000014227		8/5/210:49	Frank Brostrom						WSSLLC- 2021-202- 08042021 Charles Herring002 .docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	()
187	DMNL00241_000014232		8/5/21 11:41		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>		[EXTERNAL] Re: Herring Detailed Report edited - final		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	()
188	DMNL00241_000014236		8/10/21 22:00		Frank Brostrom <frank.brostrom@gmail. com=""></frank.brostrom@gmail.>	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov< td=""><td></td><td></td><td>[EXTERNAL] proposed consensual recorded telephone call</td><td></td><td>Microsoft Outlook Note</td><td>AWP</td><td>Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.</td><td>(</td><td></td></hlu@law.nyc.gov<></eproshan@law.ny 			[EXTERNAL] proposed consensual recorded telephone call		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	(

Case 2:20-cv-05965-ENV-RER Document 71-1 Filed 07/07/23 Page 23 of 23 PageID #: 1308

	A	В	С	D	E	F	G	Н	I	J	K	L	M	N	0
189	DMNL00241_000014237		8/10/21 23:09		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov </eproshan@law.ny 			[EXTERNAL] Re: proposed consensual recorded telephone call		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
190	DMNL00241_000014275		10/8/21 10:01		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			Re: [EXTERNAL] Checking in		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	0
191	DMNL00241_000014309		11/2/21 10:39		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com="">; "Proshansky, Eric (Law)" <eproshan@law.ny c.gov=""></eproshan@law.ny></frank.brostrom@>			Justin Freeman		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
192	DMNL00241_000014311		11/3/21 15:47		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>		Re: [EXTERNAL] Re: Justin Freeman		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
193	DMNL00241 000014312		11/3/21 12:49		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 			[EXTERNAL] Fwd: Justin Freeman		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
194	DMNL00241_000014317		11/18/21 17:24		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>		[EXTERNAL] Re: freeman		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
195	DMNL00241_000014321		11/23/21 10:34		Frank Brostrom <frank.brostrom@gmail. com></frank.brostrom@gmail. 	"Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>		Re: [EXTERNAL] Email		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0)
196	DMNL00241_000014323		11/24/21 12:20		"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	Frank Brostrom <frank.brostrom@ gmail.com>; "Proshansky, Eric (Law)" <eproshan@law.ny c.gov></eproshan@law.ny </frank.brostrom@ 			RE: [EXTERNAL] Email		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	